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Attorneys for Defendants/Counter-Plaintiffs Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF
CANADA, et al.,

Defendants.

Civil. No.:

3:18-CV-00493-MAS-LHG

**JOINDER IN DEFENDANT AIG
INSURANCE COMPANY OF
CANADA'S CROSS-MOTION FOR
JUDGMENT ON THE PLEADINGS
AND IN OPPOSITION TO
PLAINTIFFS' MOTION FOR
JUDGMENT ON THE PLEADINGS**

PLEASE TAKE NOTICE that Defendants/Counter-Plaintiffs Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, incorrectly named as "Lloyd's Syndicate CVS 1919," and Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861," by and through their

attorneys, Marks, O'Neill, O'Brien, Doherty & Kelly, P.C. and Wilford Conrad LLP, ("Defendants") hereby join in Defendant AIG Canada's Cross-Motion for Judgment on the Pleadings and in Opposition to Plaintiffs' Motion for Judgment on the Pleadings (the "Cross-Motion")(Docket Entry No. 233).

In support of this Joinder, Defendants adopt and incorporate the reasons set forth in AIG's June 30, 2020 Memorandum of Law in Support of the Cross-Motion (Docket Entry No. 238), and respectfully request this Court grant the Cross-Motion and deny Valeant's motion for judgment on the pleadings.

Dated: June 30, 2020

Respectfully submitted,

By: /s/ Melissa J. Brown
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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on June 30, 2020, the foregoing document was filed with the Clerk of the U.S. District Court, District of New Jersey, via CM/ECF, which will cause copies to be served upon all counsel of record.

By: /s/ Melissa J. Brown